

NOTICE OF FILING

Details of Filing

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File Title: MOIRA DEEMING v JOHN PESUTTO
Registry: VICTORIA REGISTRY - FEDERAL COURT OF AUSTRALIA



A handwritten signature in blue ink that reads 'Sia Lagos'.

Registrar

Important Information

This Notice has been inserted as the first page of the document which has been accepted for electronic filing. It is now taken to be part of that document for the purposes of the proceeding in the Court and contains important information for all parties to that proceeding. It must be included in the document served on each of those parties.

The date of the filing of the document is determined pursuant to the Court's Rules.

Form 59
Rule 29.02(1)

Affidavit of John Ruddick

VID 1023 of 2023

Federal Court of Australia
District Registry: Victoria
Division: General

MOIRA DEEMING

Applicant

JOHN PESUTTO

Respondent

Affidavit of: **John Ruddick**
Address: [REDACTED]
Occupation: Member of the NSW Legislative Council
Date: 24 May 2024

Filed on behalf of (name & role of party)	<u>Moira Deeming, Applicant</u>
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[Version 3 form approved 02/05/2019]




I, John Ruddick of [REDACTED], say on oath:

Background

1. I am a member of the New South Wales Legislative Council and a Member of the Libertarian Party (formerly the Liberal Democratic Party).
2. Prior to joining the Liberal Democratic Party in 2021, I had been a member of the Liberal Party for over twenty-five years.
3. I worked as a member of staff to former Federal Member of Parramatta, Ross Cameron, and was twice a candidate for the presidency of the New South Wales Liberal Party.
4. In 2021, I left the Liberal Party to join the Liberal Democrats.
5. On 20 April 2023, I was elected a Member of the New South Wales Legislative Council.

Exhibit

6. Exhibited to this affidavit is a paginated bundle of documents marked 'Exhibit JR-1'.

Moira Deeming

7. I met Moira Deeming for the first time in May 2023 at a lunch in Sydney.
8. Prior to that, I knew of Moira from her maiden speech to Parliament in February 2023. [REDACTED] had forwarded it to several people. Prior to 19 March 2023, people I knew who also knew or knew of Moira (namely, people in my political circles and members of the public) regarded her as having a reputation for being courageous in that she said things which other people were too afraid to say but believed privately, particularly on gender issues. After Moira's maiden speech she became a well-known figure among politically interested people. Those I most frequently speak with thought she was an exceptionally courageous and likeable person. It was clear she was not a stock-standard new politician.
9. I recall watching footage of the 'Let Women Speak' rally. I believe I watched it live on television. I was keeping an eye on it, including because a member of the Liberal Democrats was there and I generally follow political events. I do not recall Moira being mentioned in the news as having attended or been involved in the rally until Mr Pesutto said so on 19 and 20 March 2023. I recall Mr Pesutto making public statements in which he was suggesting that Moira was associating or hanging around Nazis.
10. When I met Moira at the lunch in May 2023, I found her very engaging and friendly. But we also spoke about the accusations which Mr Pesutto had publicly made about her and I could tell she was very upset about it. I recall she was distressed but also perplexed as to why Mr Pesutto had said what she considered to be false things about her. It was




clearly disturbing for someone who I am certain has had no alignment in any way with Nazis to be publicly named by a significant political leader as having an alignment.

11. We also spoke again in July 2023 at a Friedman Conference. She and I were both speakers at the event. She gave a speech in which she addressed the allegations which had been made about her and her expulsion from the Victorian Parliamentary Liberal Party. She got very emotional talking about the attacks which Mr Pesutto had made on her. She had to pause for around a minute and had tears and a trembling voice.
12. We spoke about half a dozen times around that time in July 2023. On each occasion, she would raise the allegations and was upset by them.
13. I recall seeing comments about Moira on Twitter since 19/20 March 2023 which were disparaging of Moira (or disparaging of me for publicly supporting Moira), including many which implied she was a Nazi or Nazi supporter. For example:

(a) Comments on or around 20 March 2023 (which were in response to a tweet I posted on 20 March 2023 in support of Moira):

- i. *"So you are okay with a politician supporting nazis?"* (page 1 of Exhibit JR-1);
- ii. *"So you're supporting an MP that supports Nazis"* (page 2 of Exhibit JR-1);
- iii. *"Members of your political party hanging out with Nazis should be stressful"* (page 3 of Exhibit JR-1);
- iv. *"Libs attract people who are quite a bit Nazi because they appeal electorally to people who are a little bit Nazi"* (page 4 of Exhibit JR-1);
- v. *"John Ruddick is soft on Nazis"* (page 5 of Exhibit JR-1);
- vi. *"If you see someone sit at a table with 10 Nazis, you are looking at 11 Nazis"* (page 6 of Exhibit JR-1);

(b) Comments in May 2023 saying:

- i. *"Do we call her by one name? Just "Moira" now, just like Prince, Madonna and her mate Hitler?"* (page 7 of Exhibit JR-1);
- ii. *"But not enough dignity to stop prostituting herself with Weirdos and Nazi's"* (page 8 of Exhibit JR-1);

(c) Comments in July or August 2023:

- i. *"Except she actually APPEARED with Nazis"* (page 9 of Exhibit JR-1); and
- ii. *"Its [sic] the anti abortion nazi bigots talking about womens rights again"* (page 10 of Exhibit JR-1).




14. In my experience of politics, when allegations are made about a public figure such as an MP, many people will assume it is a case of 'where there's smoke there's fire'. [REDACTED]

[REDACTED]

This will obviously impact on her reputation. It will lose her votes and will undermine her standing within her party. It will make her a highly polarising person. Many people in political circles, who will have concerns about maintaining their own reputations, will avoid associating with her. I have seen myself that people online have criticised me for publicly supporting Moira.

Sworn by the deponent)
at Sydney)
in New South Wales)
on 24 May 2024)
Before me:)


Signature of deponent


Signature of witness

Adam Kadmon, Solicitor
Name and qualification of witness